

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MEPCO FINANCE CORPORATION,

Plaintiff/Counter-Defendant,

Case No. 1:11-cv-369
Honorable William T. Hart

v.

**MOTION FOR ENTRY OF CONSENT
JUDGMENT**

TIER ONE WARRANTY LLC; and DALLAS
NATIONAL INSURANCE COMPANY,

Defendants/Counter-Plaintiffs,

and

DALLAS NATIONAL INSURANCE
COMPANY,

Cross-Claimant,

v.

TIER ONE WARRANTY LLC,

Cross-Defendant.

NOW COMES PLAINTIFF, Mepco Finance Corporation ("Mepco"), by and through its attorneys, and herby moves this Court for entry of the consent judgment attached as **Exhibit A**. In support of this motion, Mepco states as follows:

1. In October 2013 Mepco and Tier One Warranty LLC ("Tier One") entered into a settlement agreement (the "Settlement Agreement") under which Tier One agreed to pay Mepco \$3,250,000 pursuant to an agreed-upon payment schedule. (*See* Settlement Agreement, **Ex. B**.)
2. Tier One also agreed to the entry of the consent judgment attached as **Exhibit A** if Tier One defaulted under the terms of the parties' Settlement Agreement, including by missing any of the scheduled payments required under the Settlement Agreement.

3. Tier One has not made any of the required payments under the Settlement Agreement and is currently in default. (*See* B. Doyle Decl., **Ex. C.**)

4. Mepco sent notice of default to Tier One pursuant to the terms of the Settlement Agreement, and Tier One's cure period has expired. (*See id.*)

WHEREFORE, Mepco respectfully requests that the consent judgment attached as **Exhibit A** be entered pursuant to the parties' agreement.

Respectfully submitted,

VARNUM LLP
Attorneys for Plaintiff/Counter-Defendant

Date: August 4, 2014

By: /s/ Brion B. Doyle

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 4th day of August, 2014, a true and correct copy of the foregoing was served via the Court's CM/ECF system to:

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